

At Albuquerque NM
FILED
SEP 11 2018

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)
)
Plaintiff,) CRIMINALNO. 18-CR-2945 WJ
vs.) Count 1: 18 U.S.C. § 371: Conspiracy;
)
JANY LEVEILLE,) Count 2: 18 U.S.C. §§ 922(g)(5) and 2:
SIRAJ IBN WAHHAJ,) Possession of a Firearm and Ammunition
HUJRAH WAHHAJ,) by an Alien Illegally and Unlawfully in
SUBHANAH WAHHAJ, and) the United States.
LUCAS MORTON,)
)
Defendants.)

INDICTMENT

The Grand Jury charges:

Count 1

A. The Agreement

1. From a date unknown to the Grand Jury, but at least from in or about November 2017 and continuing thereafter until at least in or about August 2018 in the District of New Mexico and elsewhere, the defendants, **JANY LEVEILLE, SIRAJ IBN WAHHAJ, HUJRAH WAHHAJ, SUBHANAH WAHHAJ, and LUCAS MORTON**, did knowingly conspire, combine, confederate, agree, and act interdependently with each other and with others known and unknown to the Grand Jury to knowingly provide **JANY LEVEILLE**, an alien who was illegally and unlawfully in the United States, possession of firearms, in violation of 18 U.S.C. § 922(g)(5).

B. The Manner and Means

The manner and means by which the conspiracy was sought to be accomplished included, among other things, the following during the dates of the alleged conspiracy:

EXHIBIT A

2. It was part of the conspiracy that **SIRAJ IBN WAHHAJ** and **HUJRAH WAHHAJ**, and others known and unknown to the Grand Jury, gathered firearms and ammunition.

3. ~~It was further part of the conspiracy that **JANY LEVEILLE** and **SIRAJ IBN WAHHAJ**, and others known and unknown to the Grand Jury, took and transported across state lines minor children in fulfillment of **JANY LEVEILLE's** religious prophecies.~~

4. It was further part of the conspiracy that **JANY LEVEILLE**, **SIRAJ IBN WAHHAJ**, **HUJRAH WAHHAJ**, **SUBHANAH WAHHAJ**, and **LUCAS MORTON**, transported firearms and ammunition from the State of Georgia to the State of New Mexico.

5. ~~It was further part of the conspiracy that **JANY LEVEILLE**, **SIRAJ IBN WAHHAJ**, **HUJRAH WAHHAJ**, **SUBHANAH WAHHAJ**, and **LUCAS MORTON**, and others known and unknown to the Grand Jury, established a residence, training camp, and firing range at which they stored firearms and ammunition and engaged in firearms and tactical training as part of their common plan to prepare for violent attacks on government, military, educational, and financial institutions in fulfillment of **JANY LEVEILLE's** religious prophecies.~~

C. Overt Acts

In furtherance of the conspiracy, and to effect the objects thereof, **JANY LEVEILLE**, **SIRAJ IBN WAHHAJ**, **HUJRAH WAHHAJ**, **SUBHANAH WAHHAJ**, and **LUCAS MORTON**, and others known and unknown to the Grand Jury, committed overt acts within the District of New Mexico and elsewhere, including, but not limited to, the following:

6. In or about December 2017, **JANY LEVEILLE**, **SIRAJ IBN WAHHAJ**, **HUJRAH WAHHAJ**, **SUBHANAH WAHHAJ**, and **LUCAS MORTON** traveled over state lines in vehicles owned by **JANY LEVEILLE** and **LUCAS MORTON** with firearms and

ammunition.

7. In or between December 2017 and August 2018 in Taos County, in the District of New Mexico, **JANY LEVEILLE, SIRAJ IBN WAHHAJ, HUJRAH WAHHAJ, SUBHANAH WAHHAJ, and LUCAS MORTON** established a residence under the leadership of **JANY LEVEILLE** and in accordance with her religious prophecies.

8. In or between December 2017 and August 2018 in Taos County, in the District of New Mexico, **JANY LEVEILLE, SIRAJ IBN WAHHAJ, HUJRAH WAHHAJ, SUBHANAH WAHHAJ, and LUCAS MORTON** possessed and discharged firearms[.] as part of their common plan to prepare for violent attacks on government, military, educational, and financial institutions in fulfillment of **JANY LEVEILLE's** religious prophecies.

9. In or between December 2017 and August 2018 in Taos County, in the District of New Mexico, **JANY LEVEILLE, SIRAJ IBN WAHHAJ, HUJRAH WAHHAJ, SUBHANAH WAHHAJ, and LUCAS MORTON** established a training camp and firing range at which **JANY LEVEILLE, SIRAJ IBN WAHHAJ, HUJRAH WAHHAJ, SUBHANAH WAHHAJ, and LUCAS MORTON** and minor children engaged in firearms and tactical training as part of their common plan to prepare for violent attacks on government, military, educational, and financial institutions in fulfillment of **JANY LEVEILLE's** religious prophecies.

10. In or between December 2017 and August 2018 in Taos County in the District of New Mexico, **JANY LEVEILLE, SIRAJ IBN WAHHAJ, HUJRAH WAHHAJ, SUBHANAH WAHHAJ, and LUCAS MORTON**, and others known and unknown to the Grand Jury, stored firearms and ammunition[.] as part of their common plan to prepare for violent attacks on government, military, educational, and financial institutions in fulfillment of **JANY**

LEVEILLE's religious prophecies.

11. In or between December 2017 and August 2018 in Taos County in the District of New Mexico, and elsewhere, **JANY LEVEILLE** and **SIRAJ IBN WAHHAJ**, and others known and unknown to the Grand Jury, sought to recruit and train persons, including minor children, to be prepared to engage in jihad and train an army of jihad and to die as martyrs as part of the common plan to prepare for violent attacks on government, military, educational, and financial institutions in fulfillment of **JANY LEVEILLE's religious prophecies.**

12. In or between December 2017 and August 2018, in Taos County in the District of New Mexico, **SIRAJ IBN WAHHAJ** and **HUJRAH WAHHAJ**, and others known and unknown to the Grand Jury, provided **JANY LEVEILLE** possession of firearms they had purchased.

All in violation of 18 U.S.C. § 371.

Count2

In or between December 2017 and August 2018, in Taos County, in the District of New Mexico, the defendant, **JANY LEVEILLE**, being an alien illegally and unlawfully in the United States, knowingly possessed, in and affecting commerce, firearms and ammunition.

In violation of 18 U.S.C. §§ 922(g)(5) and 2.

A TRUE BILL:

K. Bradley
Assistant United States Attorney

/s/ _____
FOREPERSON OF THE GRAND
JURY

CDL
08/22/2017 3:47 p.m.